

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)) No. 17-cr-10098-GAO
BURHAN UD DIN,)
Defendant.)

Government's Amended Exhibit List

The government submits the attached amended list of potential trial exhibits, which adds to and replaces several exhibits from the most recently submitted list (Dkt. 129). The new exhibits are:

- Ex. 33
- Ex. 177
- Ex. 183
- Ex. 184
- Exs. 190–201, which replace Exs. 190–193 from Dkt. 129.

Exhibit numbers with no accompanying description were intentionally left blank to allow for the possible future addition of an exhibit of the same or a similar type.

The government reserves the right to supplement this list as necessitated by matters arising between now and the conclusion of trial, including arguments or evidence presented by the defense.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Brian A. Pérez-Daple
Scott L. Garland
Brian A. Pérez-Daple
Assistant U.S. Attorneys

– Government’s Exhibit List –
United States v. Din, No. 17-cr-10098-GAO

Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: July 23, 2019

/s/ Brian A. Pérez-Daple
Assistant United States Attorney

– Government’s Exhibit List –
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Exhibit	Description	Admitted Date/Witness
1	Notepad - Boston Store (June 2009 - April 2010)	
2	Notepad - Boston Store (April 2010 - Aug. 2010)	
3	Notebook - Boston Store (Aug. 2010 - Oct. 2011)	
4	Accounting Notebook - Boston Store (March 2013 - July 2013)	
5	Accounting Notebook- Chelsea Store (June 2009 - March 2011)	
6	Accounting Notebook - Chelsea Store (Aug. 2012 - July 2013)	
7		
8		
9		
10	Din 2008 IRS 8879 e-File Signature Authorization	
11	Din 2009 IRS 8879 e-File Signature Authorization	
12	Din 2009 W-2 (1041 Tremont Inc)	
13	Din 2009 W-2 (Crown Fried Chicken)	
14	Din 2010 IRS 8879 e-File Signature Authorization	
15	Din 2011 IRS 8879 e-File Signature Authorization	
16	Din 2012 IRS 8879 e-File Signature Authorization	
17	Din 2013 IRS 8879 e-File Signature Authorization	
18		
19		
20	Blank IRS Form 941 (2009)	
21	Blank IRS Form 941 (2010)	
22		
23		
24		
25	Burhan Din IRS Form 1040 (2008)	
26	Burhan Din IRS Form 1040 (2009)	
27	Burhan Din IRS Form 1040A (2010)	
28	Burhan Din IRS Form 1040A (2011)	
29	Burhan Din IRS Form 1040A (2012)	
30	Burhan Din IRS Form 1040A (2013)	
31		
32		
33	Din personal check dated Aug. 22, 2008 (BofA account ending 0514)	
34		
35	Calculation of Payroll Taxes Due – Chelsea Store (Q2 2009 - Q2 2010)	
36	Calculation of Payroll Taxes Due - Chelsea Store (Q2 2009-Q4 2010)	

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Exhibit	Description	Admitted Date/Witness
37	Calculation of Profits (Chelsea Store - Q2 2009 - Q2 2010)	
38	Calculation of Profits (Chelsea Store - Q2 2009 - Q4 2010)	
39	Calculation of Unreported Payroll (Chelsea Store - Q2 2009 - Q2 2010)	
40	Calculation of Unreported Payroll (Chelsea Store - Q2 2009 - Q4 2010)	
41	Schedule of Wages Paid by Chelsea Store (2009-2010)	
42		
43		
44		
45	IRS Form 941 Instructions (2008)	
46	IRS Form 941 Instructions (2009)	
47	IRS Form 941 Instructions (2010)	
48	IRS Form 941 Instructions (2011)	
49	IRS Form 941 Instructions (2012)	
50	IRS Form 941 Instructions (2013)	
51		
52		
53		
54		
55	Boston Store Form 941 (Q1 2009)	
56	Boston Store Form 941 (Q2 2009)	
57	Boston Store Form 941 (Q3 2009)	
58	Boston Store Form 941 (Q1 2010)	
59	Boston Store Form 941 (Q2 2010)	
60	Boston Store Form 941 (Q3 2010)	
61	Boston Store Form 941 (Q4 2010)	
62	Boston Store Form 941 (Q1 2011)	
63	Boston Store Form 941 (Q2 2011)	
64	Chelsea Store Form 941 (Q2 2009)	
65	Chelsea Store Form 941 (Q3 2009)	
66	Chelsea Store Form 941 (Q4 2009)	
67	Chelsea Store Form 941 (Q1 2010)	
68	Chelsea Store Form 941 (Q2 2010)	
69	Chelsea Store Form 941 (Q3 2010)	
70	Chelsea Store Form 941 (Q4 2010)	
71	Jamaica Plain Form 941 (Q4 2010)	
72	Jamaica Plain Form 941 (Q1 2011)	
73	Jamaica Plain Form 941 (Q2 2011)	
74	Jamaica Plain Form 941 (Q3 2011)	
75	Jamaica Plain Form 941 (Q4 2011)	

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Exhibit	Description	Admitted Date/Witness
76	Jamaica Plain Form 941 (Q1 2012)	
77	Jamaica Plain Form 941 (Q2 2012)	
78	Jamaica Plain Form 941 (Q3 2012)	
79	Jamaica Plain Form 941 (Q4 2012)	
80	Jamaica Plain Form 941 (Q1 2013)	
81	Jamaica Plain Form 941 (Q2 2013)	
82	Jamaica Plain Form 941 (Q3 2013)	
83		
84		
85	Chelsea Store Exterior Photo	
86	Chelsea Store Interior Photo	
87	Chelsea Store Kitchen Photo	
88	Chelsea Store Interior Storage Photo	
89	Chelsea Store Employee Phone Number List Photo	
90	Boston Store Exterior Photo	
91	Jamaica Plain Store Interior Photo	
92	Jamaica Plain Store Refrigerator Photo	
93	Jamaica Plain Store Basement Photo	
94	Jamaica Plain Store Sketches	
95	Jamaica Plain Store Exterior (1)	
96	Jamaica Plain Store Exterior (2)	
97		
98		
99		
100	Form 941 Account Transcript - Chelsea Store (Q2 2009)	
101	Form 941 Account Transcript - Chelsea Store (Q3 2009)	
102	Form 941 Account Transcript - Chelsea Store (Q4 2009)	
103	Form 941 Account Transcript - Chelsea Store (Q1 2010)	
104	Form 941 Account Transcript - Chelsea Store (Q2 2010)	
105	Form 941 Account Transcript - Chelsea Store (Q3 2010)	
106	Form 941 Account Transcript - Chelsea Store (Q4 2010)	
107	Form 941 Account Transcript - Chelsea Store (Q1 2011)	
108	Account Transcript Showing W-2 Wages for Chelsea Store (2010)	
109		
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113		
114		
115	Form 941 Account Transcript (Boston Store Q1 2009)	
116	Form 941 Account Transcript (Boston Store Q2 2009)	
117	Form 941 Account Transcript (Boston Store Q3 2009)	

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Exhibit	Description	Admitted Date/Witness
118	Form 941 Account Transcript (Boston Store Q4 2009)	
119	Form 941 Account Transcript (Boston Store Q1 2010)	
120	Form 941 Account Transcript (Boston Store Q2 2010)	
121	Form 941 Account Transcript (Boston Store Q3 2010)	
122	Form 941 Account Transcript (Boston Store Q4 2010)	
123	Form 941 Account Transcript (Boston Store Q1 2011)	
124	Form 941 Account Transcript (Boston Store Q2 2011)	
125	Form 941 Account Transcript (Boston Store Q3 2011)	
126	Form 941 Account Transcript (Boston Store Q4 2011)	
127	Form 941 Account Transcript (Boston Store Q1 2012)	
128	Form 941 Account Transcript (Boston Store Q2 2012)	
129	Form 941 Account Transcript (Boston Store Q3 2012)	
130	Form 941 Account Transcript (Boston Store Q4 2012)	
131	Form 941 Account Transcript (Boston Store Q1 2013)	
132	Form 941 Account Transcript (Boston Store Q2 2013)	
133	Form 941 Account Transcript (Boston Store Q3 2013)	
134		
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138		
140	Form 941 Account Transcript (Jamaica Plain Q4 2010)	
141	Form 941 Account Transcript (Jamaica Plain Q1 2011)	
142	Form 941 Account Transcript (Jamaica Plain Q2 2011)	
143	Form 941 Account Transcript (Jamaica Plain Q3 2011)	
144	Form 941 Account Transcript (Jamaica Plain Q4 2011)	
145	Form 941 Account Transcript (Jamaica Plain Q1 2012)	
146	Form 941 Account Transcript (Jamaica Plain Q2 2012)	
147	Form 941 Account Transcript (Jamaica Plain Q3 2012)	
148	Form 941 Account Transcript (Jamaica Plain Q4 2012)	
149	Form 941 Account Transcript (Jamaica Plain Q1 2013)	
150	Form 941 Account Transcript (Jamaica Plain Q2 2013)	
151	Form 941 Account Transcript (Jamaica Plain Q3 2013)	
152		
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155	Restaurant Depot Sales and Invoices (Boston Store 2010-2013)	
156	Hershey Creamery Sales and Invoices (Boston Store 2007-2013)	
157	NY Poultry Invoices (Chelsea Store - 2009)	
158	NY Poultry Invoices (Chelsea Store - 2010)	
159	NY Poultry Invoices (Chelsea Store - 2011)	

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Exhibit	Description	Admitted Date/Witness
160	Hershey Creamery Sales History Report (Chelsea Store - 2008-2012)	
161	American Sirloin Invoices (Chelsea Store - 2010-2013)	
162	Pepsi Invoice Report (Chelsea Store - 2010-2013)	
163	Restaurant Depot Receipts (Chelsea Store 2011-2013)	
164	Hershey Creamery Sales and Invoices (Jamaica Plain 2011-2013)	
165		
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169		
170	Crown Fried Chicken Account Opening Statement (Sovereign)	
171	Sovereign Bank Records (Chelsea Store Dec. 2008 - Dec. 2009)	
172	Eman Crown Corp. Articles of Incorporation (Chelsea Store)	
173	Nasir Inc. Articles of Incorporation (Jamaica Plain Store)	
174	Food Establishment Application (Jamaica Plain Store)	
175	Lease (Jamaica Plain Store)	
176	Victualer's License Personal Information Form (Jamaica Plain Store)	
177	Chelsea Permitting and Inspection Records (Chelsea Store – 2008)	
178	U.S. Dept. of Homeland Security Travel Records for A. Al-Garibawi (2009)	
179	U.S. Dept. of Homeland Security Travel Records for A. Al-Garibawi (2010)	
180	Al-Garibawi Wage Chart	
181	Ali Payroll Wage Chart	
182	Irfan Payroll Wage Chart	
183	Statement of Discontinuation of Business for Boston Gourmet Pizza (Sept. 22, 2008)	
184	Occupancy Permit for Boston Gourmet Pizza (Nov. 19, 2007)	
185		
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190	N-400 Pre-Interview Preparation Worksheet	

- Government's Exhibit List -
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Exhibit	Description	Admitted Date/Witness
191	N-400 Application for Naturalization, Submitted by Burhanud Din	
192	Passport from A-file	
193	U.S. Naturalization Test - Civics	
194	U.S. Naturalization Test English - Reading	
195	U.S. Naturalization Test English - Writing	
196	Wage, Earnings, Tax Documents from A-file	
197	N-652 Naturalization Interview Results	
198	Certificate Preparation Sheet and Oath Declaration	
199	N-400 Adjudication Processing Worksheet	
200	Form N-445 (signed March 18, 2010)	
201	Certificate of Naturalization	